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August 8, 2014

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. We write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce, particularly with respect to developments in MDL 2543.

First, on July 21, 2014, pursuant to Judge Furman’s Order No. 1 § X.A (attached hereto for the Court’s convenience as Exhibit 1), Temporary Lead Counsel for Plaintiffs (“TLC”) and New GM submitted letters to Judge Furman regarding the status of MDL cases and related actions. Copies of TLC’s and New GM’s letters are attached hereto as Exhibits 2 and 3, respectively.

Second, on July 28, 2014, pursuant to Judge Furman’s Order No. 1 § X.B, TLC and New GM submitted a joint proposed agenda for the initial conference to be held by Judge Furman on August 11, 2014, as well as the parties’ respective positions regarding the issues raised in the proposed agenda. A copy of TLC’s and New GM’s joint letter is attached hereto as Exhibit 4.

Third, on August 4, 2014, Gary Peller, counsel for plaintiffs Ishmail Sesay, Joanne Yearwood, Lawrence Elliott, Celestine Elliott, and Berenice Summerville, submitted to Judge

Honorable Robert E. Gerber
August 8, 2014
Page 2

Furman a Notice of Developments in Related Proceedings Between Parties Establishing an Adversarial Relationship with the Plaintiffs' Group and an Associated Failure to Protect the Common Interest Privilege after Plaintiffs' Leadership Disclosed Confidential Communications Among Plaintiffs' Counsel to GM's Opposing Counsel. A copy of Mr. Peller's notice is attached hereto as Exhibit 5.

Fourth, on August 5, 2014, New GM submitted a letter to Judge Furman regarding developments in the Motion to Enforce Proceedings pending before the Court as well as an update on matters raised in New GM's July 21 letter. A copy of New GM's August 5 letter is attached hereto as Exhibit 6.

Finally, on August 7, 2014. Judge Furman issued Order No. 7, setting out his preliminary views on the issues raised in the parties' July 28, 2014 joint letter, as well an agenda for the August 11, 2014 initial conference. A copy of Order No. 7 is attached hereto as Exhibit 7.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

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